

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Child and Family Services Agency



Administration Issuance: CFSA-07-02

TO: All CFSA Staff

FROM: Darlene R. Mansfield, PHR
Human Resources Administrator

DATE: January 31, 2007

RE: Conflict of Interest and Outside Employment

The District of Columbia Child and Family Services Agency (CFSA) requires all employees to maintain the highest standards of professional and ethical conduct at all times during the course of their employment in order to ensure the public's ongoing confidence in the integrity of the Agency and its mission. Accordingly, employees are expected to refrain from any actions that would adversely affect the proper performance of CFSA business. Standards of honesty, integrity, and impartiality are considered essential components of the Agency's expectations for all employees.

Additionally, the Agency requires that no employee actions or outside activities conflict or appear to conflict with the fair, impartial, and objective performance of officially assigned duties and responsibilities. Such actions may include but are not limited to outside employment, private business activities, and/or financial interests that may in any manner appear to diminish the vision and mission statements and best practices of the Agency.

This administrative issuance provides general guidance for staff regarding Conflict of Interest and Outside Employment. There may be specific circumstances that are not covered by this issuance. General questions regarding Conflict of Interest and Outside Employment may be directed to the CFSA Human Resources Administration at (202) 724-7373. Ethics questions concerning conflicts of interest and outside employment should be directed to Sarah R. Kaplan, CFSA's Ethics Counselor (sarah.kaplan@dc.gov or (202)442-6154) or the D.C. Ethics Counselor at (202) 724-1521.

Conflict of Interest

1. CFSA employees shall avoid all actions which might result in, or create the appearance of:
 - a. using public office for private gain;
 - b. giving preferential treatment to any person;
 - c. impeding government efficiency or economy;
 - d. losing complete independence or impartiality;
 - e. making a government decision outside official channels; or
 - f. adversely affecting the confidence of the public in the integrity of government.

2. CFSA employees shall not solicit or accept, either directly or through the intercession of others, any gift, gratuity, favor, loan, entertainment, or other like thing of value from a person who singularly or in concert with others:
 - a. has or is seeking to obtain contractual or other business or financial relations with the District government;
 - b. conducts operations or activities that are subject to regulation by the District government; or
 - c. has an interest that may be favorably affected by the performance or non-performance of the employee's official responsibilities.
3. The restriction in paragraph 2 does not preclude the acceptance of a voluntary gift of nominal value or of a cash donation in a nominal amount which is presented on a special non-recurring occasion such as marriage, illness, or retirement, but excluding birthdays, or other annually-recurring events.
4. CFSA employees shall not solicit a contribution from another employee for a gift to an official superior, make a donation as a gift to an official superior, or accept a gift from an employee receiving less pay. This does not preclude the presentation or acceptance of a voluntary gift of nominal value or of a cash donation in a nominal amount when given on a special, infrequent occasion such as a marriage, illness, or retirement.
5. For the purposes of paragraphs 3 and 4, the term "nominal" means an individual cash donation of no more than \$10 or an individual voluntary gift of no more than \$10 in market value.
6. CFSA employees shall not receive any salary or anything of monetary value from a private source as compensation for an employee's services to the District government.
7. CFSA employees shall immediately report directly and without undue delay to the CFSA Director and to the Office of the Inspector General of the District of Columbia any information concerning conduct which is or appears to be a conflict of interest.
8. It is the policy of the District government to avoid conflict of interest concerning the award, implementation, monitoring, and performance of contracts for services. Upon initial appointment, newly hired CFSA employees shall be required to disclose to the Human Resources Administration any ongoing economic benefits being received from previous employment relationships. This shall be done during the new hire processing procedures conducted by HR. All new hires shall be advised of this issuance.
9. For one (1) year after the date of hire, an employee required to make such disclosure shall be screened from and shall not participate in any manner, in the government's decision to enter into, extend, modify, or renew a contract or consultancy engagement with the employee's former employer. This one (1) year restriction shall be extended for as long as the employee receives an ongoing economic benefit from the former employer. CFSA shall be governed by the exceptions as stated in the section 1803.14 of the D.C. Personnel Regulations.

Outside Employment

1. CFSA employees shall not engage in any outside employment or other activity which is not compatible with the full and proper discharge of his or her duties and responsibilities as a government employee. Activities or actions that are not compatible with government employment shall include, but are not limited to, the following examples:
 - a. Engaging in any outside employment, private business activity, or other interest which may interfere with the employee's ability to perform his or her job, or which may impair the efficient operation of the District government;

- b. Using government time or resources other than for official business, or government-approved or sponsored activities. A CFSA employee may, however, spend a reasonable amount of government time and resources on such projects, reports, and studies as may be considered in aid of other government jurisdictions (local, state, or federal), provided the work so performed is within the scope of the individual's regular assignments as a CFSA employee;
 - c. Ordering, directing, or requesting subordinate employees to perform during regular working hours any personal services not related to official District government functions and activities;
 - d. Maintaining financial or economic interest in or serving (with or without compensation) as an officer or director of an outside entity if there is any likelihood that such entity might be involved in an official government action or decision taken or recommended by the employee;
 - e. Engaging in any outside employment, private business activity, or interest which permits an employee, or others, to capitalize on his or her official title or position;
 - f. Divulging any official government information to any unauthorized person or in advance of the time prescribed for its authorized issuance, or otherwise making use of or permitting others to make use of information not available to the general public;
 - g. Engaging in any outside employment, private business activity, or other interest which might impair an employee's mental or physical capacity to such an extent that he or she can no longer carry out his or her duties and responsibilities as a CFSA employee in a proper and efficient manner;
 - h. Serving in a representative capacity or as an agent or attorney for any outside entity involving any matter before the District of Columbia; or
 - i. Engaging in any outside employment, private business activity, or other interest which is in violation of federal or District law.
2. CFSA employees shall not engage in outside employment or private business activity or have any direct or indirect financial interest that conflicts with or would appear to conflict with the fair, impartial and objective performance of officially assigned duties and responsibilities.